

**Navy Responses to RIDEM Comments on the
Navy's Interim Responses to Comments on the Draft Final Feasibility Study
Calf Pasture Point (Site 07)
NCBC Davisville, Rhode Island**

This document contains the Navy's responses to RIDEM's comments (dated 13 June 1997) on the Navy's Interim Responses to RIDEM Comments (dated 28 May 1997) on the Draft Final Site 07 Feasibility Study (FS) (dated April 1997). The Interim Response to Comments document also contained a Conceptual Long-Term Monitoring Plan (LTMP) for Site 07. The Navy will present a revised version of the conceptual LTMP at the 22 July 1997 BCT meeting.

Comment: The responses to comments are acceptable, however, it should be noted that RIDEM never intended for the Navy to sample surface water in Allen Harbor. RIDEM was referring to the sampling of surface waters associated with the wetlands on Calf Pasture Point. Upon reviewing the Navy responses to RIDEM's request to sample sediments it is agreed that this can be deferred until such a time as groundwater monitoring indicates a need for sampling sediments. Similarly, surface water on Calf Pasture Point also need not be sampled until groundwater data indicates a need for surface water sampling. RIDEM still, however, reiterates its concern that geologic information about Allen Harbor should be obtained to ascertain where contamination from Calf Pasture Point as well as Allen Harbor Landfill may enter the Harbor.

Response: The Navy agrees that the sampling of interior wetlands sediment and/or surface water can be deferred until more ground-water data are obtained from the monitoring program. As shown in the recently submitted Draft Final Proposed Plan for Site 07, the Final FS will state that, during the long-term monitoring program, the sampling of shoreline seeps and sediment/surface water from interior wetlands may be conducted, as warranted, based upon trends observed from the analyses of ground-water samples. The scope of the long-term monitoring program to be employed at Site 07 will be determined during the Remedial Design phase.

The Navy believes that the most likely points of discharge to the harbor can be determined without further investigation of conditions beneath Allen Harbor. This will be addressed in the presentation of the proposed Conceptual LTMP for Site 07 on 22 July 1997. Additional requirements for information to support the design of the LTMP will be collected as a part of that effort.

Comment: RIDEM also review the attached conceptual Long Term Monitoring Plan (LTMP) and finds it to be acceptable. As the Navy notes, this is a conceptual plan and therefore subject to modification. The LTMP can be finalized during the design phase which should include the acquisition of geologic information within Allen Harbor. The Navy notes that during the remedial design phase performance standards should be developed which will be used to provide exit

criteria to eliminate the sampling of parameters as part of the LTMP. RIDEM supports this proposal but would also like to see similar standards set to determine when the LTMP should be expanded and to determine the need for active remediation.

Response: The Navy will present a revised version of the conceptual LTMP at the 22 July 1997 meeting. The Navy acknowledges that the conceptual LTMP will be modified during the Remedial Design phase. At that time, the revised LTMP will be reviewed and agreed upon by the Navy, EPA, and RIDEM. The Navy agrees that the performance standards will include exit criteria (both for analytical parameters and number of wells included) and risk-based action levels for expansion of the monitoring program or for initiating further action.